UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

VAUGHAN & BUSHNELL)	
MANUFACTURING CO.,)	
an Illinois corporation)	
-)	
Plaintiff,)	
)	Case No. 09 C 668
v.)	
)	Judge Lefkow
INFOR GLOBAL SOLUTIONS)	_
(MICHIGAN), INC., a Michigan)	Magistrate Judge Denlow
corporation, and INFOR GLOBAL)	
SOLUTIONS, INC., a Delaware)	
Corporation,)	
•)	
Defendants.)	

STIPULATED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

Plaintiff Vaughan & Bushnell Manufacturing Co. ("Vaughan & Bushnell") and defendants Infor Global Solutions (Michigan), Inc. and Infor Global Solutions, Inc. (collectively "Infor"), by their undersigned attorneys, jointly bring this motion and stipulate as follows:

- 1. Vaughan & Bushnell commenced this declaratory judgment action in this Court on February 2, 2009.
- 2. Infor was served through CT Corp. on February 3, 2009, which currently makes Infor's responsive pleading due on or before February 23, 2009.
- 3. Vaughan & Bushnell have agreed to a 30-day extension for Infor to answer or otherwise respond to the Complaint. Thus, by the parties' agreement, Infor would file its responsive pleading on or before March 25, 2009.

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4. The parties recognize and agree that this Stipulated Motion shall in no way affect or impair the rights, defenses or objections of any party.

WHEREFORE, the parties respectfully request that the Court grant the parties' *Stipulated Motion For Extension Of Time To Answer Or Otherwise Respond To Plaintiff's Complaint*, and enter proposed order, attached hereto as Exhibit A.

VAUGHAN & BUSHNELL MANUFACTURING CO.

By: /s Richard M. Assmus
One of its Attorneys

Hugh R. McCombs Richard M. Assmus Jonathan H. Kim Mayer Brown LLP 71 S. Wacker Drive Chicago, IL 60606-4637 (312) 782-0600

INFOR GLOBAL SOLUTIONS (MICHIGAN), INC. and INFOR GLOBAL SOLUTIONS, INC.

By: /s Jamenda A. McCoy
One of its Attorneys

Kathryn F. Taylor Jamenda A. McCoy KIRKLAND & ELLIS LLP 200 East Randolph Drive Chicago, IL 60601-6636 (312) 861-2000 (312) 861-2200 (Fax) Daniel D. Zegura (Pro Hac Vice Pending) ROGERS & HARDIN LLP 2700 International Tower Peachtree Center 229 Peachtree Street, N.E. Atlanta, GA 30303 (404) 522-4700 (404) 525-2224 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2009, I caused a true and correct copy of the foregoing *Stipulated Motion For Extension Of Time To Answer Or Otherwise Respond To Plaintiff's Complaint* to be served electronically via CM/ECF, upon the following counsel of record:

Hugh R. McCombs Richard M. Assmus Jonathan H. Kim MAYER BROWN LLP 71 South Wacker Drive Chicago, IL 60606-4637 (312) 782-0600

> /s Jamenda A. McCoy Jamenda A. McCoy